

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

December 19, 2019

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees (the "PECs") write to request an extension of time to respond to defendant Yassin al Kadi's¹ interrogatories currently due January 3, 2020. As the Court may recall, Plaintiffs have sought the deposition of Wa'el Jelaidan for some time now and have requested that the Jelaidan deposition occur before responding to Mr. Kadi's interrogatories. Mr. Kadi previously testified that he and Mr. Jelaidan were friends and worked together for many years. The Jelaidan testimony is therefore highly relevant to Mr. Kadi.

Recognizing this, each time the Jelaidan deposition date was adjourned, the Court previously granted an extension of time for the Plaintiffs to respond to Mr. Kadi's interrogatories (see Court's September 27, October 8, and November 1 Orders (ECF Nos. 5179, 5199, 5258)). Mr. Jelaidan's November 25-26 deposition was adjourned yet again.

There is currently a motion pending from Mr. Jelaidan's counsel concerning the parameters of Mr. Jelaidan's deposition. His counsel, Martin McMahon, has consequently refused to set a new deposition date until that motion is adjudicated. Accordingly, Plaintiffs request that their response to Mr. Kadi's interrogatories be due 30 days or more, after the Jelaidan deposition concludes.

¹ Mr. Kadi was formerly a Specially Designated Global Terrorist ("SDGT"). His deposition was previously taken in London for this litigation. Mr. Jelaidan is still designated as an SDGT.

Plaintiffs contacted Mr. Kadi's counsel Peter Salerno, to request his consent to the adjournment and Mr. Salerno indicated that he consented to Plaintiffs' request.

Respectfully submitted,

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For the Plaintiffs' Exec. Committees

cc: The Honorable George B. Daniels, via ECF
All Counsel of Record via ECF